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**From:** Webster, David [Webster.David@epa.gov]  
**Sent:** 5/15/2017 5:51:08 PM  
**To:** Kipka, Undine [kipka.undine@epa.gov]  
**Subject:** FW: Question

Nice job!

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**From:** COUTU Clary [mailto:clary.coutu@keoliscs.com]  
**Sent:** Monday, May 15, 2017 1:03 PM  
**To:** Kipka, Undine <kipka.undine@epa.gov>  
**Cc:** Webster, David <Webster.David@epa.gov>  
**Subject:** RE: Question

Thank you Undine- this helps me understand the process better. Thank you again for your diligence and prompt response in guiding my efforts. Regards, Clary

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**From:** Kipka, Undine [mailto:kipka.undine@epa.gov]  
**Sent:** Monday, May 15, 2017 12:49 PM  
**To:** COUTU Clary <clary.coutu@keoliscs.com>  
**Cc:** Webster, David <Webster.David@epa.gov>  
**Subject:** RE: Question

Good morning Clary,

At the moment, we are working on drafting a reissuance (item #1 in your list below) of the NPDES permit MA0003590 with the existing operators (MBTA and Keolis) and co-permittees (City of Somerville; MA DCR; and DW NP, LLC) identified as the parties responsible for permit conditions relating to the single outfall (Outfall 001) that discharges industrial stormwater to the Unnamed Tributary (a Water of the United States known locally as Millers River). A permit modification (item #2) is not being considered because NPDES permit MA0003590 has expired and has been administratively continued. A new permit (item #3) is also not being considered because Outfall 001 was and is covered by NPDES permit MA0003590 and still discharges to the same waterbody identified in the permit.

That said, we are certainly incorporating information about the infrastructure changes you noted into drafting the permit, and expect that information that you provide to us through the pending 308 request will be very helpful. We will also be happy to consider any additional information you provide to us outside of the formal 308 request. If you'd like to do that, please direct that information to me electronically. Furthermore, there will an opportunity for you to comment on the draft permit during the public comment period. I will let you know as soon as we have reached that stage - the draft permit will be available online then ([https://www3.epa.gov/region1/npdes/draft\\_permits\\_listing\\_ma.html](https://www3.epa.gov/region1/npdes/draft_permits_listing_ma.html)).

If you have further questions about NPDES permit issuance procedures or NPDES permit MA0003590 in particular, please don't hesitate to follow up with me or with David Webster, our EPA Region 1 Water Permits Branch chief, who is copied on this e-mail.

Thanks,

Undine Kipka  
(617) 918 1335

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**From:** COUTU Clary [mailto:clary.coutu@keoliscs.com]  
**Sent:** Monday, May 15, 2017 9:21 AM

**To:** Kipka, Undine <[kipka.undine@epa.gov](mailto:kipka.undine@epa.gov)>

**Subject:** Question

Good morning Undine-

Given the changes to infrastructure at the Prison Point site since 2015, do you anticipate the MA 0003590 permit to be a:

1. Renewal
2. Modification/Amendment
3. New Permit

Does any of those meet the at best the most probable description for the changes of infrastructure on site by MBTA for the Permit?

Thank you for your diligence.

**Clary COUTU**

Manager of Environmental Compliance

**Keolis**

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